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March 8, 2001

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340 July 15

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Leverett Nelson, Associate Regional Counsel * United States Environmental Protection Agency Region 5 77 W. Jackson Blvd. - C14J Chicago, IL 60604

> Schreiber/Caravan Drum site, 3033 Bourke, Detroit, Michigan 48238 Re: MERRI CORDET MYG TABBER MED

Site No. 05PY

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Boll rolling of Charley are of ment of the 30.00 Johns

Dear Mr. Nelson:

Enclosed herein please find EPA internal documentation received by the undersigned via a freedom of information request, which documents indicate that as of February 25, 1994 the "clean up is complete" and that "This site receives a no further action designation." Given the foregoing, we submit that any costs of the EPA subsequent to that date are clearly erroneous and should be deleted? I hope you find this information helpful in having the EPA auditing department correct the bill previously sent to Schreiber Corporation.

Per our conversation of February 28, 2001, this letter shall also confirm that until such time as a revised bill is sent, no interest or costs will be assessed.

Sincerely,

KERR, RUSSELL AND WEBER, PLC

KRV/nef Enclosure

Chuck Rosa cc:

the get the soil

SITE DESCRIPTION/EXECUTIVE SUMMARY

RECORDS CENTER
7TH FLOOR

Site Name and Location

Schreiber/Caravan Drums 3033 Bourke Detroit, MI 48238 County: Wayne

MDNR District: S.E Michigan

EPA ID: MID985630185

SITE LOCATION

This site is located in the city of Detroit, Wayne County, Michigan. It is bordered to the north by Bourke Avenue and private residences, to the south by the Consolidated Rail Corporation railroad tracks, to the east by a hospital laundry processing facility and to the west by an abandoned automotive spring manufacturing facility.

SITE HISTORY

The site property was operated by the Schreiber Roofing Company from 1980 until 1983 and used primarily as a storage facility for roofing materials and equipment. In 1983, the property was sold to the Caravan Chemical Company which operated the facility as a manufacturer of industrial and commercial surfactants. In 1985, the property was transferred from the Caravan Chemical Company to R.L. Enterprises, which currently operates the facility as a manufacturer of industrial and commercial surfactants.

In 1991, a tar boiler and 14 drums in various stages of decay, some leaking their contents onto the ground, were discovered east of the facility building in a small wooded area. In addition, a 20 foot by 60 foot area of stained soil was located under the leaking drums. Access to the area was slightly restricted with the building wall, and a fence surrounding the site. One side of the fence was cut however, allowing access to the drums.

Samples were collected from the 14 drums and analyzed. Elevated levels of xylene, toluene, naphthalene, benzene, ethyl benzene and PAHs were detected.

In 1992, the US EPA Technical Assistance Team (TAT) oversaw the prp conducted cleanup and remediation at the site. Thirteen drums were staged and overpacked for removal and disposal at a licensed facility. Approximately 1,000 cubic feet of soil was excavated and transported to a local disposal facility. During the contaminated soil removal, 2,500 gallons of aqueous liquids were pumped from the excavation area and transported off-site for treatment and disposal.

Post excavation sampling indicated all areas of contamination were removed and State of Michigan Type B Cleanup Criteria were met. The excavated area was backfilled with clean soil and brought to local grade completing the site removal.

SITE GEOLOGY

The geology of the site consists of a sand and gravel mixture of soil in glacial deposit of unknown depths. Clay layers are interspersed throughout the glacial deposits with bedrock found at approximately one hundred plus feet depths. Both glacial till aquifers and bedrock aquifers are not potable sources of drinking water.

MIGRATION PATHWAYS

The migration pathways of concern were the groundwater pathway and the soil exposure pathway. Area population receives its drinking water from the City of Detroit Municipal Water Supply. The threat to area groundwater was removed with the soil excavation and drum remediation. There are nearby residential homes and a school. Area population was at risk to exposure to contaminants even though the area was completely enclosed by a chain link fence and one wall of the facility building. There was however, a gash in part of the fence which would allow site access by area residents. Since the excavation and drum removal however, this threat no longer exists. This site receives a no further action designation.

2/25/1994

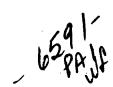
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POTENTIAL HAZARDOUS WASTE SITE

5

	PART 1 - SITE INFOR	MATION AND ASSESS	MENT	MI 983630185	
IL SITE NAME AND LOCATION					
)1 SITE NAME (Lagat, common, or descriptive name of alte) _	4	02 STREET, ROUTE NO.,	OR SPECIFIC LOCATION	IDENTIFIER	
Schreiber-Curavan	Drums	3033 Bourke			
03 ÇITY		04 STATE 05 ZIP CODE	06 COUNTY	07 COUNTY 08 CONG	
Detroit		MI 48238	dusauno	CODE DIST	
O COORDINATES LATITUDE	LONGITUDE	1. 12 18 00	31 -0 -1711	10211	
MANUAL EXILIDRE	CONGITODE	•			
					
O DIRECTIONS TO SITE (Starting from recent) public road)					
II. RESPONSIBLE PARTIES		Log STREET (Burbon and			
		02 STREET (Business, malls)	3		
RL Enterprises		3033 60	ourke.		
DE CITY		04 STATE 05 ZIP CODE	06 TELEPHONE	NUMBER	
Detroit		MI 4823	8 1	- .	
7 OPERATOR (If known and different from owner)	1	08 STREET (Business, malin	g, residential)		
(Same as abou				•	
e CITY	. 	10 STATE 11 ZIP CODE	12 TELEPHONE	NUMBER	
			()	l	
3 TYPE OF OWNERSHIP (Check one)					
A. PRIVATE [] B. FEDERAL:	-	C. ST.	ATE DD.COUNTY	☐ E. MUNICIPAL	
	(Agency name)			LI E. MORROFAL	
☐ F. OTHER:	(Specify)	G. UN	KNOWN		
4 OWNER/OPERATOR NOTIFICATION ON FILE (Check at a				- 4	
A. RCRA 3001 DATE RECEIVED: MONTH DAY	LI B. UNCONTR	OLLED WASTE SITE (CENCLA)	103 a DATE RECEIVE	D: / / C. NONE	
MONTH DAY	T TEAN			MONTH DAY YEAR	
				•	
V. CHARACTERIZATION OF POTENTIAL HA	ZARD BY (Check of that anoty)		· · · · · · · · · · · · · · · · · · ·		
V. CHARACTERIZATION OF POTENTIAL HA	ZARD BY (Check of that anoty)		C. STATE	D. OTHER CONTRACTOR	
V. CHARACTERIZATION OF POTENTIAL HA	ZARD BY (Check of that anoty)		D C. STATE		
IV. CHARACTERIZATION OF POTENTIAL HA	ZARD BY (Check of that anoty)	EPA CONTRACTOR DEFICIAL D F. OTHER:	O C. STATE	D. OTHER CONTRACTOR	
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V. CHARACTERIZATION OF POTENTIAL HA 1 ON SITE INSPECTION YES DATE	BY (Check of that begin) BY (Check of that	EPA CONTRACTOR DEFICIAL D F. OTHER: SI: PERATION BEGINNING YEAR END	PSANT (Specify) J UNKNOWN	
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EPA FORM 2070-12 (7-81)



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POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2 - WASTE INFORMATION

L IDENTIFICATION
OI STATE 02 SITE NUMBER
985 630 85

		10.0111.0750	07100	,				
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01 PHYSICAL S	1YSICAL STATES (Check of their apply) 02 WASTE QUANTITY AT			1				
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LI B. POWDER	R. FINES F. LIQUID	TONS .	1000	; j C. RADIOA			L K. REACT	
		CUBIC YARDS .	1000	:: O. PERSIST	ENI LI FLIGHT	ADLE	L. M. NOT A	
LI D. OTHER	(Spec#y)	NO, OF DRUMS	14			_		
III. WASTE T	YPE					_		
CATEGORY	SUBSTANCE N	AME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS			
SLU	SLUDGE							
OLW	OILY WASTE		1000 M3		Contaw	inat	وا الم	re found
SOL	SOLVENTS		14 drum	K			य ०५ व	
PSD	PESTICIDES				OFT	102	1. Soi	
осс	OTHER ORGANIC CH	REMICALS			120'4	bo')	₹+61	wed!
юс	INORGANIC CHEMIC	ALS			helle	red	contri	ned, minated.
ACD	ACIDS				-220		001110	· · · · · · · · · · · · · · · · · · ·
BAS	BASES							
MES	HEAVY METALS							
IV. HAZARDO	DUS SUBSTANCES (544 A)	spends for most frequent	ty caled CAS Numbers)					
01 CATEGORY	02 SUBSTANCE N	AME	03 CAS NUMBER	04 STORAGE/DISP	OSAL METHOD	05 CO	NCENTRATION	06 MEASURE OF CONCENTRATION
	XVIene							
	ethil benz	ene		Conter	1 to 1	4 7	ecave	4
	benzene			2 dru	ms over		ed En	H
Ì	Jaluene			vem	aver for	4 0	Doen	
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V. FEEDSTO	CKS (See Appendix for CAS Number		<u> </u>	1				1
CATEGORY	01 FEEDSTOC		02 CAS NUMBER	CATEGORY	01 FEEDS	TOCK NAM		02 CAS NUMBER
FDS		<u>-</u>		FDS				OZ CAS NOMBER
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	OF INFORMATION (Care)			FDS				
								
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\$EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

ART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

L IDENTIFICATION
OI STATE OZ SITE NUMBER
TO 985630185

PART 3 - DESCRIPTION OF HA	ZARDOUS CONDITIONS AND INCIDENTS
II. HAZARDOUS CONDITIONS AND INCIDENTS	
01 A. GROUNDWATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED:	02 OBSERVED (DATE: 17/1941) POTENTIAL OALLEGED 04 NARRATIVE DESCRIPTION.
During cleanup, 2500 gc	is of water removed from cite
from Soil excavation a with clean soil.	irea. Excavated area badefilled
01 D B. SURFACE WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED:	02 OBSERVED (DATE:) OPOTENTIAL ALLEGED 04 NARRATIVE DESCRIPTION
NIA - None observ	vcd.
01 C. CONTAMINATION OF AIR 03 POPULATION POTENTIALLY AFFECTED:	02 OBSERVED (DATE:) D POTENTIAL D ALLEGED 04 NARRATIVE DESCRIPTION
N/A - None observ	
01 D. FIRE/EXPLOSIVE CONDITIONS 03 POPULIATION POTENTIALLY AFFECTED: 100, (300)	02 OBSERVED (DATE: 12/1951) X POTENTIAL OALLEGED 04 NARRATIVE DESCRIPTION A decayed barrels and in soil consist
Contaminates found is	n decayed barrels and in soil consist
of solvents and BTEX.	All were removed from site.
cleanup standards for	All wore removed from site, - State met.
01 M.E. DIRECT CONTACT 03 POPULATION POTENTIALLY AFFECTED: 100,000	02 OBSERVED (DATE: 12/1561) POTENTIAL O ALLEGED
14 drums leaking br	erty of Schneiber/Caravan.
01 MF. CONTAMINATION OF SOIL 1000 3	02 OBSERVED (DATE: 1) 1991) POTENTIAL O ALLEGED
Contaminated soil rem	noved for disposal; clean soil
wed to badefill exca	vation.
01 [] G. DRINKING WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED:	02 OBSERVED (DATE:) POTENTIAL ALLEGED O4 NARRATIVE DESCRIPTION
N/A-None observed	. Area population receives
drinking water from	n City of Detroit muntcipal suppl
01 [] H. WORKER EXPOSURE/INJURY 03 WORKERS POTENTIALLY AFFECTED:	02 OBSERVED (DATE:) OPOTENTIAL ALLEGED O4 NARRATIVE DESCRIPTION
	•
MA- None observe	'
01 🗆 I. POPULATION EXPOSURE/INJURY	02 LI OBSERVED (DATE: 12/1941) POTENTIAL LI ALLEGED
01 [] I. POPULATION EXPOSURE/INJURY 03 POPULATION POTENTIALLY AFFECTED: 100,000	
tenced area of proper	intuminated soil located outside by boundary,

POTENTIAL HAZARDOUS WASTE SITE

PRELIMINARY ASSESSMENT

L IDENTIFICATION

101 STATE 02 SITE NUMBER

MI 985630185

PART 3 DESCRIPTION OF TAX	ZARDOUS CORDITIONS AND INCIDENT			
II. HAZARDOUS CONDITIONS AND INCIDENTS (Comment)			·	
01 🗆 J. DAMAGE TO FLORA 04 NARRATIVE DESCRIPTION	02 OBSERVED (DATE:)	☐ POTENTIAL	[] ALLEGED	
N/A-None observed	·			
01 K. DAMAGE TO FAUNA 04 NARRATIVE DESCRIPTION (Include name(s) of apocina)	02 OBSERVED (DATE:)	D POTENTIAL	□ ALLEGED	
NIA-None doserve	d	·		
01 () L. CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION	02 OBSERVED (DATE:)	C) POTENTIAL	O ALLEGED	
N/A- None observed				
01 M. UNSTABLE CONTAINMENT OF WASTES (Software/Visionally April of Visionally Control of Visional	02 OBSERVED (DATE: 12/1991)	POTENTIAL	D ALLEGED	
14 leaking drums spilli	ing contents onto so	il in uni	Patricted	
01 D N. DAMAGE TO OFFSITE PROPERTY 04 NARRATIVE DESCRIPTION	02 OBSERVED (DATE:)	D POTENTIAL	□ ALLEGED	
N/A-None observed				
01 0. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPB 04 NARRATIVE DESCRIPTION N/A- None on serve		□ POTENTIAL	□ ALLEGED	
01 XP. ILLEGAL/UNAUTHORIZED DUMPING	02 OBSERVED (DATE: 12/199)	POTENTIAL	□ ALLEGED	
14 drums dumped beh		• •	1114	
in wooded area.	man on order	Par 1-4 C	illity	
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEG	SED HAZARDS		· · · · · · · · · · · · · · · · · · ·	
None				
140176				
III. TOTAL POPULATION POTENTIALLY AFFECTED:	0,000 4 mile radiu			
IV. COMMENTS				
US EPA TAT Cleunup completed. Executed area baucfilled with clean soil State of Michigan Cleunup Standards achieved in past removal sampling. v. sources of information (confidence on purpose and purpose mounts)				
				
MONR ERD, Pre Romadiul Schreiber/Cu	superfund site fill ravon drums, wo	es on yne Coup	nty	